



State of Arizona
Department of Education

Tom Horne
Superintendent of
Public Instruction

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MEMORANDUM

TO: National School Lunch Program Administrators

FROM: Holly Mohr, MPH, RD
Team Leader, National School Lunch Program

SUBJECT: Direct Certification Clarification

This memorandum serves to clarify and provide additional guidance regarding the implementation of ADE's new automated Direct Certification system. The Direct Certification system is available through Common Logon at: <https://www.ade.az.gov/CommonLogon/>

When is the deadline for conducting a State Match?

All NSLP Program sponsors are required to conduct an automated match to directly certify eligible children before October 1st of the current school year. State Match may not be conducted prior to July 1st of the current school year, and may not be conducted more than 30 days prior to the first day of school.

Are School Food Authorities required to conduct additional State Matches throughout the school year?

No. Each School Food Authority is required to complete only one State Match per school year. If an SFA chooses to conduct additional matches, appropriate steps must be taken to ensure that students are updated accordingly. State Match is only capable of supplying match results and cannot simply provide updates from the previous match. For this reason, conducting additional State Matches is not recommended. It is the responsibility of the household to notify the SFA if they are no longer eligible for Food Stamp/CA benefits.

Is verification of eligibility required for those children who have been certified under Direct Certification?

No. A child's eligibility for free meals is based on documentation obtained from the DES database, DES officials, or FDPIR officials, thus verification of eligibility is not required for these children.

Our school district attempted to run a State Match only to discover that the system did not yield any matches. What did we do wrong?

ADE's Direct Certification State Match is linked to both the Department of Economic Security (DES) and the Arizona Department of Education's Student Accountability Information System (SAIS). The State Match method matches those students in the DES database against those listed in SAIS and then generates a list of matches for the appropriate school district. School districts must submit enrollment information to SAIS each school year. If your district has not submitted their current year enrollment information, State Match will not yield any results. Please contact your district's SAIS Technology Coordinator to determine whether or not enrollment information has been submitted for the current school year.

What is SAIS?

The Student Accountability Information System (SAIS) is an administrative application that collects student detail information using the Internet. SAIS enables schools to electronically submit raw student and school data for data processing and reporting. SAIS provides essential information to educators, legislators and parents about the budgets, expenditures, and achievement levels of schools. All Local Education Agencies (LEAs) – school districts and charter holders – are required to submit student detail information to the SAIS database.

Our school is a BIA school and does not report enrollment information to SAIS. Are we still able to utilize the Direct Certification system?

Yes, however, you will not be able to utilize option #3, the State Match method. The State Match method of Direct Certification is dependent on the DES and SAIS databases to produce results. BIA schools will need to directly certify eligible students via the Data Entry or File Upload method.

Our district has several children that are eligible for free meals via FDPIR, however, the State Match does not include these children. Are households receiving FDPIR benefits included in the DES database?

No. DES only certifies those households who are receiving Food Stamps and Cash Assistance (CA). They do not certify households who are receiving FDPIR benefits. In Arizona, the Food Distribution Program on Indian Reservations (FDPIR) is administered by Indian Tribal Organizations (ITOs). There are seven ITOs in Arizona, each serving one or two of Arizona's nine Indian tribes. Upon approval of a household's eligibility to participate in FDPIR, the appropriate ITO provides that household with a letter stating they have been approved. Participating households may submit a copy of this letter to the SFA, thus, directly certifying that child for free meal benefits. Households must reapply for FDPIR benefits every twelve months. If the family is unable to obtain a copy of this letter, they must then complete an income application, indicating their FDPIR case number. FDPIR case #s can be verified by contacting the appropriate ITO. ITO contact information may be located at:
<http://www.fns.usda.gov/fdd/contacts/fdpir-contacts.PDF>

If a household submits an application with a Food Stamp or Cash Assistance case number and that child is not listed on the State Match results, what additional steps must be taken by the SFA to determine whether or not the case number provided is valid?

1. To obtain match data for students that were not included in the State Match, the SFA must first attempt to verify those children either via Data Entry or File Upload.
2. If the child cannot be directly certified via Data Entry or File Upload, the SFA may then temporarily approve that child for free meals for up to 45 days. The SFA shall mail a Direct Certification Notification of Temporary Approval to the household notifying them of the 45-day temporary approval. The Direct Certification Notification of Temporary Approval letter is available online at: <http://www.ade.az.gov/health-safety/cnp/nslp/parentforms.asp>
3. Thirty days after the initial State Match was conducted, the SFA should conduct a File Upload or Data Entry to verify the eligibility of those children that were not included in the State Match results.
4. If after the File Upload or Data Entry, the child is still not able to be directly certified, the SFA must then contact the Department of Economic Security to verify that the case number is valid, and certify the child for meal benefits as appropriate. DES contact information is available online at: <http://www.de.state.az.us/faa/AllZipsServByEachSite.asp>
5. If it is determined that the child is not eligible to receive benefits, or that the case number provided on the application is invalid, the household must be given 10 days advance, written notice that free meal benefits will be terminated. The first day of the 10-day advance notice is the day that the Notification of Adverse Action is mailed. The Notification of Adverse Action is available online at: <http://www.ade.az.gov/health-safety/cnp/nslp/parentforms.asp>. The Notification of Adverse Action must be accompanied by an application and parent letter.
6. If a DES official indicates that a household's application for FSP, CA, or TANF benefits is pending approval, and the child's 45-day temporary approval has expired, the child must be placed in the paid category and Notification of Adverse Action must be mailed to the household. **An SFA may only grant one Direct Certification 45-day temporary approval per household.**

A household submits an application with a Food Stamp or Cash Assistance case number and that child is not listed on the State Match results. The SFA places the child on 45-day temporary approval. Five days into the 45 days, the SFA is able to determine that the case number provided is invalid. Should the SFA decrease the child's benefits immediately, or should they wait until the end of the 45 days?

A Notification of Adverse Action must be mailed to the household within three days of determining that the child is not eligible to receive free meal benefits under Direct Certification. The Notification of Adverse Action must be accompanied by an application and parent letter to provide the family the opportunity to apply for benefits based on income. Similarly, households of children approved to receive free meal benefits must be notified of their free meal benefits within three days of certifying the child for free meals.

When utilizing Data Entry or File Upload, the match results are yielding duplicate matches. How can we avoid duplicate matches?

Many SFAs encounter this problem when they attempt to match the eligibility information of students on less than five fields. For example, schools may enter the child's first name, last name, birthdate, and the mother's name, but do not include the child's social security number when verifying eligibility. Attempting to match eligibility information on less than five fields has a greater potential of yielding inaccurate results and may often result in duplicate matches. To obtain the most accurate match results, it is recommended that the SFA use all five fields.

What are the SFA's documentation requirements for Direct Certification?

Each School Food Authority shall print a report that identifies those children directly certified via State Match. Similarly, a report must also be printed to indicate those children that are directly certified via File Upload or Data Entry. If a child cannot be directly certified via the Direct Certification system, but their eligibility is verified with DES, the determining official shall initial the child's application and indicate the date that verification of eligibility was obtained. Documentation of direct certification must be kept on file for three years following the last claim filed.

A household's income application indicates that their child is eligible for reduced-price meals, however, the State Match results indicate that the child is directly certified to receive free meals. Should we place the child in the free or reduced-price category?

If the income information provided on a current application contradicts the direct certification results, the direct certification match shall override the income application. The determining official shall document on the income application that the child is directly certified.

May a parent refuse free meal benefits for their child?

Yes. If a child is eligible to receive free meals via direct certification and the child's parent/guardian does not want their child to receive free meal benefits, they may choose to decline these benefits. If a household refuses the meal benefits, the SFA must discontinue the

benefits immediately and document the refusal.

Have the NSLP program forms available online been updated to reflect the most current information regarding Direct Certification?

Yes, National School Lunch Program forms have been updated. In addition, the Notification of Adverse Action letter has been amended to include a reduction in benefits resulting from an invalid case number. Program forms may be downloaded at: <http://www.ade.az.gov/health-safety/cnp/nslp/parentforms.asp>. If you have already printed your program forms for the year, you are not required to reprint these forms, provided they have been approved by ADE for the 2003-2004 school year. If you are using the prototype forms available on our website, prior approval is not required. If you have not printed your program forms, please download the revised forms at the Internet address provided above.

If you have questions of concerns regarding this memo, please contact your assigned specialist.

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